

REMARKS

Reconsideration and allowance of the subject application in view of the foregoing amendments and the following remarks is respectfully requested.

Claims 19-38 are pending. Claim 29 has been amended to correct a typographical error with respect to dependency of the claim.

The indication of allowability with respect to claims 29-35 is noted with appreciation.

Claim 29 objection

The objection to claim 29 is believed overcome in view of the foregoing amendment and withdrawal of the objection is respectfully requested.

Claims 19-28, and 36-38 are patentable over Krishnaswamy (US Patent 6,909,708)

The rejection of claims 19-28, and 36-38 under 35 USC 102(e) as being anticipated by KK is hereby traversed. A rejection based on 35 U.S.C. §102 requires every element of the claim to be included in the reference, either directly or inherently. There are at least four reasons KK fails to disclose or suggest every element of the claimed subject matter.

At the outset, Applicants hereby request the Patent and Trademark Office (PTO) to identify with particularity and specificity where in the reference the claimed limitations are believed to be found, and more specifically in view of the fact that the reference extends more than 300 pages in length, and to identify specifically which elements of the applied reference are

believed to correspond to the claim limitations.

Further, the PTO refers to FIG. 19 of KK with respect to claim 19, however, KK does not contain a FIG. 19, instead the reference includes a FIG. 19B, 19C, 19D, 19E, 19F, and 19G. The PTO is respectfully requested to identify upon which of the Figures the PTO is relying. Without further information, Applicants presume that FIG. 19B is intended because this is the first Figure of the FIG. 19 set.

First, KK fails to disclose an automaton as claimed in claim 19. The PTO asserts that FIG. 19 describes an automaton without identifying where in the reference, i.e., upon which element of FIG. 19B the PTO is relying, a disclosure of an automaton is made. FIG. 19B of KK fails to disclose or suggest an automaton for providing media content to media channels of a network communication session. The automated response unit (ARU) of FIG. 19B appears to be described as providing a video capability without including an automaton as claimed in the present claimed subject matter as set forth below. For at least this reason, withdrawal of the rejection is respectfully requested.

Second, KK appears to fail to describe the ARU as having a manager system as claimed in claim 19. Specifically, KK fails to describe the ARU as having a manager system configured to “join the automaton to an existing network communication session between an endpoint entity and a contact center responsive to receipt of an invitation to join the existing network communication session.” KK appears to describe that:

[t]he call can be routed to an ACD 4a which delivers calls to the various call processing agents like a live operator or an ARU. The ACD 4a communicates

with the ISNAP which does a group select to determine which group of agents are responsible for this call and also which of the agents are free to process this call.

KK at column 20, line 65-column 21, line 3.

Thus, KK appears to describe that ACD 4a delivers calls to various call processing agents. The ACD 4a does not appear to teach, nor has the PTO identified a teaching or suggestion of, joining an automaton to an existing network communication session as claimed in claim 19. Further, neither the ACD 4a nor the ARU appear to be described as comprising a manager system configured to join the automaton responsive to receipt of an invitation to join the existing network communication session as claimed in claim 19. For at least this reason, withdrawal of the rejection is respectfully requested.

Third, the PTO asserts that KK describes a manager system configured to join the automaton to an existing network communication system as claimed in the present claimed subject matter at column 127, lines 62-67 and column 131, lines 28-60. This is incorrect.

KK at column 127, lines 62-67, reproduced herein for ease of reference, states:

B. Scenario

If a user has a current connection to the Internet. The user will utilize H.263 compliant system software utilizing RTP (as opposed to TCP) over the Internet. If the user also desires to participate in VR MCI conference-space, and create/view video-mail, the user can join a VR session.

The identified portion of KK fails to describe a manager system of an automaton joining the automaton to an existing network communication session as claimed. The identified portion of KK appears to describe a user joining a virtual reality session and not an automaton nor responsive to receipt of an invitation to join an existing network communication session. For at least this reason, withdrawal of the rejection is respectfully requested.

KK at column 131, lines 28-60, reproduced herein for ease of reference, states:

C. Overview

The H.323 based video-conferencing architecture completely describes an architecture for multimedia communications including real-time voice, video and data, or any combination including video telephony. Users with H.323 terminals can participate in a multimedia video-conferencing session, a point-to-point video telephony session, or an audio only session with other terminal users not equipped with video facilities. The architecture also includes gateways for interworking with other video-conferencing terminals based on standards like ITU H.320 and ITU H.324.

The architecture includes a directory server for offering complete directory services including search facilities. A video mail server is an integral part of the architecture providing for the recording and playback of video mail. A video content engine is also part of the overall architecture for offering multimedia content delivery services.

H.323 terminals participating in a video-conferencing or a video telephony session communicate with the H.323 server through the MCI switch network. The H.323 server offers a variety of services including call control, information stream delivery, multi-point control and also gateway services for interworking with H.320 or H.324 terminals. The server also offers directory services and video mail services.

A H.323 terminal initiating a video call establishes a communication link with the H.323 Server through the MCI switch network. On admission to the network by the H.323 server, the server offers a directory of other available terminals to the call initiating terminal which selects a destination terminal or a destination group to participate in a video conference.

The identified portion of KK fails to describe a manager system of an automaton joining the automaton to an existing network communication session as claimed. The identified portion of KK appears to describe an H.323 based video-conferencing architecture wherein users can “participate in a multimedia video-conferencing session, a point-to-point video telephony session, or an audio only session with other terminal users not equipped with video facilities.” KK further appears to describe the offering of a “variety of services including call control, information stream delivery, multi-point control and also gateway services for interworking with

H.320 or H.324 terminals.” None of the identified portion of KK appears to describe an automaton comprising a manager system configured to join the automaton to an existing network communication system nor performing the joining in response to receipt of an invitation to join the existing network communication system as claimed in claim 19. For at least this reason, withdrawal of the rejection is respectfully requested.

Fourth, FIG. 95 of KK fails to describe a transport system configured to establish, based on the received channel information, one or more media channel connections from the automaton to a session transport mechanism associated with the existing network communication session as claimed in claim 19. FIG. 95 depicts “the control logic for step 31120 which transports the call from the current switch.” KK at column 275, lines 51-52. The identified portion of KK appears to describe, at most, the transfer of a call from a switch to a next switch without describing a transport system of an automaton as claimed in claim 19. Neither FIG. 95 nor the accompanying description thereof at column 275, line 51 through column 278, line 33 appear to describe establishing one or more media channel connections from an automaton to a session transport mechanism associated with an existing network communication session. For at least this reason, withdrawal of the rejection is respectfully requested.

For each of the foregoing reasons, claim 19 is patentable over the references of record and a Notice of Allowance is in order.

Claims 20-28 depend, either directly or indirectly, from claim 19, include further important limitations, and are patentable over KK for at least the reasons advanced above with respect to claim 19 from which they depend. For at least the foregoing, claims 20-28 are

allowable and an indication to that effect is in order.

Claim 36 is patentable over KK as KK fails to describe establishing a media channel connection from an automaton to a session transport mechanism associated with an existing network communication session between an endpoint entity and a contact center responsive to receipt of an invitation to join the existing network communication session. Claim 36 is patentable over KK for at least reasons similar to those advanced above with respect to claim 19. For at least these reasons, withdrawal of the rejection is respectfully requested.

For each of the foregoing reasons, claim 36 is patentable over the references of record and a Notice of Allowance is in order.

Claims 37 and 38 depend from claim 36, include further important limitations, and are patentable over KK for at least the same reasons as claim 36 from which they depend. For at least the foregoing, claims 36-38 are allowable and an indication to that effect is in order.

Conclusion

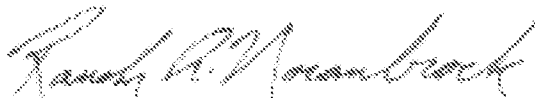
The PTO is invited to telephone the undersigned, Applicant's attorney of record, to facilitate advancement of the present application.

Early issuance of a Notice of Allowance is courteously solicited.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 08-2025 and please credit any excess fees to such deposit account.

Respectfully submitted,

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A handwritten signature in dark ink, appearing to read 'Randy A. Noranbrock', is written over a horizontal line.

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